

**BEFORE THE ENVIRONMENT COURT
AT WELLINGTON**

ENV-2015-WLG-024

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of applications for
resource consent by
Site 10 Redevelopment
Limited Partnership and
Wellington City Council
in respect of the area
known as Site 10

**STATEMENT OF EVIDENCE OF BRADDYN (BRAD) THOMAS COOMBS
ON BEHALF OF SITE 10 REDEVELOPMENT LIMITED PARTNERSHIP AND
WELLINGTON CITY COUNCIL
03/07/15**



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INTRODUCTION

1. My name is Braddyn (Brad) Thomas Coombs. I hold the position of Director at Isthmus Group Ltd. I have been in this position since December 2009. Prior to that I was an Associate and Senior Landscape Architect at Isthmus since February 2006.
2. I have a Bachelor of Landscape Architecture (Hons) Degree from Lincoln University and a Bachelor of Horticulture Degree from Massey University. I have over 18 years' experience in the field of Landscape Architecture and in particular the assessment of landscape and natural character values and the effects of proposals on those values. I am a Registered NZILA Landscape Architect.

CODE OF CONDUCT

3. I have read the Code of Conduct for expert witnesses in the Environment Court Practice Note 2014. My brief of evidence has been prepared in compliance with the Code of Conduct and I agree to comply with the Code in giving my oral evidence. I am not, and will not behave as, an advocate for the applicants. I am engaged by the applicants as an independent expert. Isthmus services a range of clients. I have no other interest in the outcome of the proceedings.

BACKGROUND AND SCOPE OF EVIDENCE

4. I have been asked to provide evidence in relation to the urban design and landscape effects in relation to the public open space development of Sites 8 and 9, Whitmore Plaza and the open spaces and connections around the proposed building for Site 10. Urban design assessment and evidence for the Site 10 building has been prepared by others.
5. I have been providing the applicants with my expertise in relation to the landscape, visual and urban design effects of the development since August 2014. I have also been involved in a number of waterfront site developments, including the successful consenting of a waterfront museum at Tauranga City, reviewing the waterfront development plan for the Tauranga City waterfront development, the Wynyard Quarter Plan Changes for the development of the waterfront and headland for Auckland Council, reviewing the Long Bay

Structure Plan for Auckland Regional Council (as it was then), reviewing and negotiating the Chelsea Sugar Site Structure Plan as well as the design, consenting and review of a number of other waterfront and urban developments, including wharves, jetties, boat ramps, new buildings, walkways and reserve projects. I have undertaken a number of natural character assessments for specific projects and at a District or catchment scale.

6. I am familiar with the site having visited it in relation to the rest of the Kumutoto development on a number of occasions over the last 8 years or so, and have been on a number of specific site visits throughout the course of my input to the application and the preparation of this evidence.
7. I have reviewed the application documents, the Landscape Design Statement (and the subsequent landscape design evidence) and the Wellington City Council section 87F report in the preparation of this evidence.
8. My evidence will cover the following matters:
 - (a) Landscape and Visual Assessment;
 - (b) Urban Design Assessment;
 - (c) Conclusions of the assessments (from the application);
 - (d) Consideration of Submissions;
 - (e) Section 87F Report; and
 - (f) Conclusions.

Introduction

9. Wellington City Council intends to redevelop the North Kumutoto area of the waterfront to create a vibrant and distinctive addition to the existing Kumutoto Precinct.

10. Isthmus was engaged by Wellington City Council to provide professional landscape architecture, architecture and urban design services for the project, in particular for the public open space design of North Kumutoto.
11. The design proposals for the public open space have responded to consultation feedback, the site context and the various strategic planning and design documents that relate to North Kumutoto and Wellington Waterfront.
12. My Landscape and Urban Design evidence is to be read in conjunction with the Landscape Design Statement, and supporting documents (attached to the evidence of Daniel Males), prepared as part of the resource consent applications. Together they describe the overall intent of the design of the public spaces and the integration with the completed Kumutoto Precinct works, waterfront and the wider city.
13. The physical site context, the overall objectives of the Wellington Waterfront Framework, the overall description of the Kumutoto Precinct and the descriptions of the proposals and physical components of the projects are described in the Landscape Design Statement. The key areas described are:
 - Site 8;
 - Whitmore Plaza;
 - Woolstore Plaza;
 - The Waterfront Promenade;
 - Kumutoto Lane; and
 - Site 9.
14. In addition to the key physical areas, the various elements that make up the physical projects, including planting, materials, furniture, lighting and earthworks are also described in the Landscape Design Statement. Mr Daniel Males has prepared a statement of evidence in relation to the landscape design of the project.

Landscape and Visual Assessment

15. As set out in the Landscape Design Statement, the Kumutoto Precinct and the combination of open spaces that make up the Precinct have a strong built edge and a direct relationship with the CBD.

- 16.** The wide multi-lane transport routes of Customhouse and Waterloo Quays also have a strong effect on the edge of the Kumutoto Precinct.
- 17.** The proposed landscape changes to the Precinct are a series of plazas, movement spaces and open spaces that together make up the public realm. The horizontal planes of the Woolstore and Whitmore Plazas, the Waterfront Promenade and Site 9¹ are an extension of the flat reclaimed land to the harbour side of the Quays.
- 18.** The built edge on the western side of the Quays is supported by a line of five trees within Whitmore Plaza. The vehicle entrance and access point breaks through the line of trees which assists in presenting the open space towards the harbour.
- 19.** Site 8 presents a small departure from the horizontal land and wharf surfaces. Site 8 tilts downwards towards the water and provides a subtle access point to the harbour, which is not generally provided throughout the rest of the built up waterfront.
- 20.** The gently sloping surfaces of site 8 are protected by the Tug Wharf and offer a reinterpretation of an urban beach in a protected spot behind the historical structures.
- 21.** A visual change as a result of development in an urban harbour edge precinct such as Kumutoto does not constitute a negative visual effect. The key visual aspects to be considered and assessed in relation to the proposals include the maintenance and framing of views from the CBD through the site to the harbour, particularly from Waring Taylor Street across Kumutoto Plaza and Site 8 and from Whitmore Street across Whitmore Plaza. The Site photographs (drawings 5.010-5.018 attached to the applications) support and illustrate the Site Context description that is contained in the Landscape Design Statement.
- 22.** Site 8 is designed as an extension of the Kumutoto Plaza, with a playful interpretation of a folded wharf structure, which falls towards the steam mouth and harbour, ensuring that views across the top of the surface are retained. The Meridian Building forms the right hand frame to the Waring Taylor view

¹ Even if Site 9 is only temporarily a car park.

shaft towards the harbour, with Site 8 and its pavilion creating the left hand frame. This view shaft is illustrated on Figure 3 in the appendices to the evidence of Daniel Males.

- 23.** The pavilion within Site 8 is a light architectural structure that offers shelter within the otherwise open site. The Pavilion is an intermediate scale structure that relates to the smaller scale of the Kumutoto Lane ‘follies’.
- 24.** The Site 8 landform is an extension of the Kumutoto Lane edge into the wharves and provides a visual connection between land and structure.
- 25.** The visual connection from Waring Taylor Street is framed and presented towards the harbour through the Site 8 project on the edge of Kumutoto Plaza.
- 26.** The Whitmore Street view through the Plaza is filtered and framed by trees on either side of the vehicle entrance. The historic gates and pillars are features of the views and are integrated into the built edge of the Quays.
- 27.** The geometry of Whitmore Plaza in conjunction with the central space opens out to the waterfront promenade and Kumutoto Lane which cut across the front edge of the open space. The single line of lightly structured trees on the western edge of Whitmore Plaza provide some intermediate scale to the open space, but do not block views through the space – particularly from the ground level.
- 28.** The Woolstore Plaza between the Waterloo Quay Apartments and the proposed Site 10 building and the space will feel more enclosed than the plazas at the southern end of the project site. The Woolstore Plaza provides a visual and access connection between the historical and contemporary architecture of the waterfront. Unlike the Site 8 and Whitmore Plaza open spaces, there is no logical or direct connection back into the CBD street network. Retaining this historic ‘breathing space’ between the two buildings is a logical response to the evolution of architecture on the waterfront.
- 29.** The waterfront promenade, Tug Wharf and the waterfront promenade extension provide the harbour edge lineal connection through the Site. The overall design is logically built up at the edge of the CBD and falls to a horizontal plane and wharf structures at the waters’ edge. Less formal,

naturalised vegetation is found at the Site 8 edge, while taller trees anchor the lineal site back to the CBD edge.

30. The visual connections from the city are accentuated through the design of the various plazas and site spaces while the lineal promenade and laneway provide access through the spaces, without creating any visual severance or discordance from the more static spaces or the CBD. Visually, the overall design is well integrated into the Kumutoto Precinct and the wider waterfront development.

Urban Design Assessment

31. The design of the North Kumutoto Precinct is guided by both statutory and non-statutory plans and frameworks. The most relevant documents are the Central Area Urban Design Guide and the Wellington Waterfront Framework, which are also referred to in the Landscape Design Statement. The urban design quality and outcomes are assessed referring to the guidance provided by the Urban Design Guide and the Framework. Some of the guidance within the Central Area Urban Design Guide, in particular, relates more specifically to buildings, however is included for the sake of completeness.

Central Area Urban Design Guide

32. The Central Area Urban Design Guide (Design Guide) as referenced in the District Plan is the main reference for the assessment of the landscape works at the Kumutoto North site. The intent of the Design Guide is “to achieve high quality buildings, places and spaces in the Central Area of the City’ by ensuring buildings, places and spaces:

- *Are coherently designed;*
- *Make a considered response to context;*
- *Address heritage values;*
- *Establish positive visual effects;*
- *Provide good quality living and working environments;*
- *Integrate environmental sustainability principles; and*
- *Provide conditions of safety and accessibility."*

Design Coherence: *A new building or public space should have its own inherent design integrity and coherence.*

Objective O1.1 aims: *to ensure each design solution is coherently designed, demonstrates design integrity, and integrates all relevant design criteria in the best possible way.*

Guideline: *demonstrate in the design and composition of any building an overall coherence that integrates the various design guide requirements.*

33. The lineal nature of the North Kumutoto precinct by its nature links existing spaces along the waterfront and the Quays edge of the CBD. The high quality design outcomes at the Kumutoto Plaza and the Kumutoto Lane are linked through the site to the Waterloo Quay apartment building and the Waterloo Quay Wharf through a series of spaces and patterns that encourage both north south and east west movement and connections. Coherence along and through these spaces is critical.
34. The Waterfront Promenade and the Kumutoto Lane provide a cohesive relationship between the spaces provided by Site 8, the Whitmore and Woolstore Plazas. The proportion of open spaces to lanes and pedestrian and vehicle traffic complements the Kumutoto Precinct and the areas of the waterfront development to the south.
35. Site furniture and seating in the Whitmore Plaza, Site 8 and on the eastern sides of the Site 10 building and the Waterloo on Quay Apartment Buildings responds to the existing aesthetic and form of the Kumutoto Plaza works. They are complementary.
36. Tree plantings on the western edge of Site 8 and the Whitmore Plaza and on the eastern and northern edges of the Site 10 building and the Waterloo on Quay Apartment building provide coherence and consistency with the broader patterning of vegetation on the Quays and throughout the Kumutoto Precinct.
37. The design of North Kumutoto transitions from the urban CBD edge in the west to the working wharf structures on the eastern harbour edge, as is consistent with the wider Kumutoto Precinct.
38. The design coherently addresses the context, siting, height, bulk and form of surrounding buildings and landscape elements, the edges of the CBD and the

harbour, adjacent facades of buildings and the materials and details of the adjacent Wellington Waterfront spaces.

Relationship to Context: *Relating to context means understanding and responding in a considered way to conditions beyond the site.*

Objective O.2.1 *to recognise the unique qualities and sense of place of every urban setting, and respond to and enhance these with new development.*

Objective O.2.2 *to maintain or enhance the quality of the settings of individual heritage buildings, including those in heritage areas.*

Guidelines: *Consistency or contrast (G2.1); Positive precedents (G.2.2); Achieving consistency (G2.3); and Developing an authentic sense of place (G2.4).*

39. The immediate north - south context (to Kumutoto Plaza and the Waterloo on Quay Apartment Building) and the east – west context (harbour edge and the Quays) are addressed through the relationships of the open spaces and movement zones by continuing the prominent line of the Kumutoto Lane, but punctuating that line with plazas at the gateways.
40. The Waterloo and Customhouse Quay (CBD) edge is more urban in scale responding to the vehicle and pedestrian connections back into the CBD. The historic pillars and gates are integrated into the Whitmore and Woolstore plazas responding to the historic context of the working harbour.
41. The interface between the plazas and the Quays responds to the urban context of the CBD with urban spaces, edges and trees while Site 8 and the Waterfront Promenade Extension have a strong physical and contextual relationship to the wharves and the harbour. The Site 8 response goes a step further with the reinterpretation of a wharf structure that softens the existing coastal edge down to the water, providing easy access for people.
42. The Woolstore Plaza space provides both access and breathing space to the Waterloo on Quay Apartment Building and separates heritage from contemporary. The contrast between the buildings is linked by a simple plaza design and connection to the Kumutoto Lane. This space is more about respecting the architecture than providing connections between the CBD and the waterfront.

43. The contextual transition through the site from west to east is a relationship from CBD and urban, to wharf and water. A complementary relationship to the other waterfront spaces is achieved through robust materials, details and spatial relationships.

Siting, Height, Bulk and Form

The siting of buildings should allow for intended activities while also acknowledging neighbouring buildings, reinforcing valued patterns of public space, and creating positive open spaces.

Objective O3.1: *To complement existing patterns of alignment, and achieve a positive scale relationship with adjoining buildings and public spaces.*

Objective O3.2: *To respect the setting of heritage items and identified heritage areas.*

Objective O3.3: *To create coherent patterns of buildings that contribute to the amenity of neighbouring public spaces.*

Objective O3.4: *To ensure that reasonable levels of ventilation, daylight and outlook are maintained in a building's habitable spaces should development on adjacent sites be built to the maximum standard.*

Objective O3.5: *To enhance the informal pedestrian network within the Central Area, by encouraging the retention and enhancement of existing pedestrian thoroughfares, and promoting the creation of new thoroughfares where they would enhance walkability and permeability for pedestrians.*

Guidelines: *Street edge definition and building alignment (G3.1 - G3.4); Height and scale relationship (G3.5 - G3.7); Building bulk (G3.8); Natural light, outlook and ventilation (G3.9); Positive open space (G3.10); Wind effects on public space (G3.11); and Pedestrian block permeability (G3.12).*

44. The North Kumutoto design is a combination of open spaces, transitional areas and connections that provide a horizontal plane relationship between the surrounding buildings and built up areas. The project is the procession area between and past existing buildings and spaces. Connections from the CBD are logically located and aligned with CBD Street and pedestrian patterns. Sightlines and connectivity from the CBD to the waterfront are accentuated through the integration of Site 8 and the Whitmore Plaza.

45. The built edge of the Waterloo on Quay Apartment Building is continued, but stepped back slightly by the Site 10 building² and is complemented by the tree

² Although outside of this assessment.

plantings on the west edge of the Whitmore Plaza, continuing to provide the edge treatment to the Quays. Spatially this edge is punctuated by the two plazas.

46. The Kumutoto Lane is sheltered by the built edges and the taller trees within and surrounding the public spaces. Additional shelter is provided by the Site 8 pavilion and a canopy along the length of Site 9. This is a positive addition to allow for increased public use of the open spaces.
47. The slightly raised horizontal nature of the site and the immediately surrounding area is accentuated by a continuation of the land surface to the decks of the wharves and the promenade extension. Changes in level come as deliberate steps and ramped transitions.
48. Horizontal seats as platforms give form and interest to the Whitmore Plaza and the eastern edge of the Site 10 and Waterloo on Quay Apartment Building. The platforms are multi-functional and have sufficient scale to read as sculptural elements between the buildings and the expansive horizontal surfaces. Form is also given to the edges of buildings and the Quays through tree planting and coastal vegetation.
49. Light bridge structures provide connectivity between Site 8 and the Tug Wharf which adds viewing opportunities and interest over this widened portion of water.
50. The form of the waterfront promenade extension and folded deck of Site 8 depart from the horizontal surfaces and fold or step down into the harbour. The Site 8 pavilion provides an intermediate scale and pattern that relates more specifically to an intimate human scale.
51. The placement, height, bulk and form of the elements and spaces of the Kumutoto North Precinct responds to the CBD and the waterfront and create a contextual and complementary relationship to the wider Kumutoto Precinct to the south.

Edge Treatment

“The buildings that line the edges of streets and other public spaces establish their character and attractiveness”.

Objective O4.1 aims “to create building edge conditions that support pedestrian activity and enhance the visual interest, legibility, safety and comfort of streets and other public spaces”.

Guidelines: *Building forms/street frontages; Active edges; Servicing and car parking; and Shelter and building entrance enhancement.*

52. The main edges of the Kumutoto North precinct are the CBD/Quays edge and the waterfront and harbour edge. Each requires a very different response from the design.
53. The existing pattern of development along the CBD / Quays edge is continued by the Site 10 building, and Whitmore Plaza. The extension of this edge will highlight the contrast between the open spaces and the buildings: particularly the Waterloo on Quay Apartment Building, the Site 10 building and the Meridian Building.
54. The north and south edges of the site are short and provide visual and physical connections to the rest of the waterfront and CenterPort.
55. The harbour edge is open, with some built intrusions beyond the site on the Waterloo Quay Wharf and the Harbour Wharf. The design accentuates the openness of the edge to the wharfs and water and continues the visual connection to the harbour.
56. The physical edges and connections to the harbour are improved through the folded surface of Site 8 and the Waterfront Promenade Extension. This softening or blurring of this edge provides improved access to the water. The interaction with the intertidal zone through these short transitions is a condition that will draw people to use these spaces.
57. The edge treatments of North Kumutoto provide a similar CBD to wharf transition and are an appropriate and innovative response to the site.

Façade Composition and Building Tops

“The composition of buildings determines their relation to context, their design coherence, and their suitability for a range of uses”.

Objective O5.1: *To ensure the façade and building top design is coherently resolved.*

Objective O5.2: *To ensure that additions and alterations to heritage buildings maintain the heritage values of those buildings, their setting and any associated heritage area.*

Objective O5.3: *To facilitate multiple and changing building uses, except where such change adversely affects the heritage values of heritage buildings or areas.*

Guidelines: *Relationship to neighbouring buildings; Shop fronts, Building tops and roofs capes; and Human scale.*

58. This consideration relates more to buildings, however there are some elements of the design that will effectively provide extensions of the existing building facades.
59. This relates mainly to the western edge of Whitmore Plaza where the continuation of a pattern of trees will complement the line of the Site 10 building to the south towards Site 9.
60. The facades of the Site 10 building relate positively to the Waterfront Promenade and Whitmore Plaza. Additional shelter is provided on these edges of the building through the third level 'roof' that the building provides over the space below.
61. The Whitmore Plaza and Waterfront Promenade provide the horizontal step down from the buildings to the land and then the more subtle transition to the harbour surface. The entrance and active edge to the Site 10 building directly addresses Whitmore Plaza accentuating the relationship of building to space.

Materials and Detail

"Materials and detail are important in maintaining visual interest and a positive relation to context and heritage value".

Objective O6.1: *To achieve qualities of visual interest and physical robustness consistent with demands arising from the building's location in the central city.*

Objective O6.2: *To respect and conserve original heritage fabric.*

Guidelines: *Compositional coherence; Visual interest; Physical robustness; and Façade transparency.*

62. Materials and details are consistent with the palette used within the Kumutoto Precinct and the wider waterfront. Simple, honest details are robust and provide contemporary reference to the working waterfront character.
63. The materials palette includes:
- In-situ concrete, timber and asphalt;
 - Reclaimed granite cobbles;
 - Exposed aggregate concrete;
 - Hardwood furniture; and
 - A combination of large urban trees and more natural harbour edge vegetation in relation to the water edge transition at Site 8.
64. These materials complement the existing CBD and waterfront built environment. Materials and details are contemporary interpretations of the working wharf edge of the city. This approach has worked well with the Kumutoto Precinct and other Wellington Waterfront precincts. The built portion of the Kumutoto Precinct has achieved this positive relationship successfully and this approach is continued through Kumutoto North.

Wellington Waterfront Framework

65. The Wellington Waterfront Framework has guided the development of the waterfront since 2001. The framework establishes a number of Waterfront-wide objectives and design principles that have guided the design for the Kumutoto Precinct (previously known as North Queens Wharf):

Waterfront-wide Objectives:

- a) *The waterfront is locally and internationally recognised for its design.*
- b) *The waterfront is readily accessible to all people.*
- c) *The waterfront is, and is perceived to be, safe at all times.*
- d) *The waterfront is seen as an attractive place that draws Wellingtonians and visitors alike.*
- e) *The waterfront successfully caters for a wide range of events and activities.*
- f) *Significant heritage buildings (and features) are protected on the waterfront.*

g) Activities on the waterfront are integrated with those on the harbour.³

66. The Wellington Waterfront Framework Objectives are both broad and complementary to the Central Area Urban Design Guidelines that have been reviewed and applied above. Whilst non-statutory, the Framework is a useful way to test the urban design quality of the North Kumutoto Design.
67. **Objective (a)** The design of Wellington Waterfront and the Kumutoto Precinct in particular is of a very high standard, being both nationally awarded and recognised as the premiere waterfront development in New Zealand. The North Kumutoto Precinct builds on the approach and is both complementary and fresh in its outcomes.
68. **Objective (b)** North Kumutoto will provide improved access to the Waterfront through new plazas that connect the CBD street linkages to the promenade and improved access to the water through the Site 8 and Waterfront Promenade Extension structures. Site levels and transitions promote improved access for all.
69. **Objective (c)** North Kumutoto will become safer for people through the integration of CPTED principles including appropriate lighting, the rationalisation of vehicle and pedestrian access patterns and through an overall increase in the activity within the site.
70. **Objective (d)** The design as a whole is a significant improvement in the overall use of this part of this part of the waterfront. Site 8, the water's edge of Whitmore Plaza and Waterfront Promenade Extension spaces will provide a focus and a point of difference from the surrounding areas. These are places where people can touch the water. In the summer, in particular, Site 8 is likely to become a strong focal point for activity on the waterfront. Visitors and Wellingtonians have few opportunities to interact with the water along the CBD waterfront. North Kumutoto will make the most of this opportunity.
71. **Objective (e)** A number of spaces are available throughout the North Kumutoto site, which can accommodate a range of activities. Site 8 and the Waterfront Promenade Extension provide small scale spaces for water edge

3 The Wellington Waterfront Framework, 2001, Page 21.

activities and events. Whitmore Plaza is the largest activity and events space in the area and could be adapted for use for a range of events. The Woolstore Plaza is a more intimate and sheltered space that offers opportunities for less formal or organized gatherings. The Waterfront Promenade and Kumutoto Lane are linear spaces that can be utilized for activities that would benefit from through traffic or passers-by. The North Kumutoto Design also adds interest to the existing commuter and promenade activities that are accommodated daily throughout the area.

72. A range of spaces are available within the site which could readily be used for informal, formal, water related, small and medium scaled events.
73. **Objective (f)** The existing heritage buildings on the edges of the site are respected through the open space design and breathing space that is afforded to their edges and facades.
74. **Objective (g)** North Kumutoto will provide some of the few opportunities to link activities between the waterfront and the harbour through the provision of access to the water. The integration of these activities will occur over time as the uses of the landward spaces, in particular, evolve.

Conclusions from the Assessments

75. North Kumutoto is a contemporary extension of the existing Kumutoto Precinct works and the wider Wellington Waterfront project.
76. The design is visually appealing and provides an appropriate level of visual coherency and connectivity between the CBD and the waterfront.
77. The North Kumutoto design responds positively to the Central Area Urban Design Guide through the provision of a design that is coherent in connecting the various elements within and on the edges of the Site; it responds to its context and in particular the CBD to waterfront and wharf environment; it coordinates the height, bulk and form of the development to be complementary and sympathetic; it provides a strong edge to the CBD and an open transition to the wharves and the harbour; it accentuates the built facades of the heritage and contemporary architecture of the area; and it utilises materials and details that are simple, robust and appropriate.

- 78.** The Wellington Waterfront Framework objectives are promoted and achieved through the design. In particular the design continues the tradition of local and international recognition of the quality of the design of the waterfront; it provides increased and improved access to the waterfront and the harbour; it increases the safety of the Site; it will provide a point of difference and draws visitors to the site; it can cater for a range of events; it is sympathetic to the local heritage architecture; and it will integrate the activities on the waterfront with those on the harbour.
- 79.** The urban design outcomes of the North Kumutoto design are very high quality and are both appropriate and highly contextual to the local urban and harbour edge environment.

SUBMISSIONS

- 80.** A number of submissions received in relation to the Site 8 works raise issues in relation to urban design, visual and amenity effects. Submissions 10, 18, 26, 29, 36, and 37 concern matters within my area of expertise. Separate urban design assessment work and evidence has been prepared for the Site 10 building. I will focus on the submission points that relate specifically to Sites 8 and 9 and the open spaces that form part of the overall project.
- 81.** I wish to address the following matters raised in the submissions:

- (a) The waterfront should not be treated as an extension of the CBD

In the location of the proposal, the Wellington waterfront forms the eastern edge of the CBD – where the urban area ends and the harbour begins. A number of projects have designed and developed space along the Wellington waterfront that have improved access and have encouraged people to use the waterfront for a range of activities. On the whole, this type of development at the waterfront is highly valued and consultation and feedback suggests that increased access to and activity along the waterfront is a positive outcome of the design.

(b) Blocking of viewshafts

Submissions 10 and 26 raise a point in relation to the blocking of viewshafts to and from the CBD and the harbour as an issue. These submissions seem mainly concerned with the Site 10 building, particularly submission 10. In relation to any other parts of the open space development that might affect views along city streets, such as the Whitmore Street viewshaft, any introduction of structures, development or trees that have some height could have an impact on a viewshaft. As can be seen in Figure 3 attached to the evidence of Daniel Males, the Site 8 and 9 open space works do not block the viewshafts to or from the CBD through Whitmore Street or Waring Taylor Street.

The provision of spaces, structures, trees, furniture and other site features which make the space more usable and will attract more people to the waterfront will inevitably change the view, but this does not equate to a negative impact. In fact, the improvement of the activity mix and use at the waterfront will add interest and additional variety to the overall Wellington waterfront experience.

(c) *Waterfront Open Space*

Submissions 10 and 37 refer to the retention of open space within the North Kumutoto precinct as an issue. Both submissions state a preference for not putting any additional buildings on the waterfront. Submissions 29 and 36 support the open space components of the applications – particularly Sites 8 and 9 and Whitmore Plaza. The mix of plazas, activity spaces and the lineal connections through the site retain the majority of the open space throughout the site and improve the open space connections back into the CBD and along the waterfront edge.

Specific issues in relation to the Site 10 building are addressed in other evidence.

SECTION 87F REPORT

- 82.** I have read the Wellington City Council section 87F report prepared for this matter.
- 83.** The Section 87F report is supported by an Urban Design Assessment of the applications that has been carried out by Graeme McIndoe. The Section 87F report appends Mr McIndoe's report and refers to summaries and conclusions from the report in a number of places.
- 84.** At paragraphs 63-65 of the Section 87F report, Mr O'Leary reviews the open space and landscape component of the applications. The Section 87F report records Mr McIndoe's comments:
- "The approach to public space is sound, extending treatment of the promenade and Kumutoto Plaza while providing a significant area of new occupiable and high quality public open space, including what can be expected to become a signature open space at Site 8".*
- 85.** Mr O'Leary makes a final concluding statement in relation to effects at the end of paragraph 65:
- "I consider that the effects of the proposal in relation to open space and landscaping will be minor".*
- 86.** I assume that the concluding statement is in relation to any potential negative effects of the applications. My opinion is that the open space developments, in particular, will lead to strongly positive effects and will improve the amenity and the overall function of the area – attracting more people and improving access to the harbour edge and to the water.
- 87.** At paragraphs 360 to 366 the Section 87F report, Mr O'Leary reviews the applications' consistency with the 'Our Capital Spaces' – Open Spaces and Recreation Framework (2013). The report concludes that the project supports the outcomes sought under the Open Spaces and Recreation Framework, in particular the open spaces and improved access to the coastal area.

- 88.** A review of Public Spaces Policy (2008) is undertaken at paragraphs 380-383 of the Section 87F report. Mr McIndoe in Appendix 2 has also undertaken his own review of the project in relation to this policy. Both Mr McIndoe and Mr O'Leary conclude that the open space development is consistent with the policy.

CONCLUSION

- 89.** Having reviewed the original landscape, visual and urban design assessments presented with the applications, the submissions and the Wellington City Council's Section 87F report, it is my opinion that the open space proposal contained within the applications are entirely appropriate to the location and will lead to largely positive effects in relation to the improved public use and access to the waterfront, the coastal environment and the water at Kumutoto North.



Brad Coombs
3 July 2015